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November 1, 2022

Attn: Maria Mahmood 900 Cottage Grove Road Hartford, CT 06152-1233

Re: Cigna Health and Life Insurance Company SERFF Tracking #: CCGP-133388045 2022 Large Group Rate Filing

## Dear Maria:

Lewis & Ellis, Inc. (L&E) has been retained by the Vermont Green Mountain Care Board (GMCB) to review the above referenced filing. Upon review of the submitted filing documentation, the following additional information is needed.

- 1. The proposed factors in "2022 CHLIC VT Side by Side v3.xlsx" for Medical Utilization Dampening "other" category do not match the corresponding Table 8 in the rate manual. Please reconcile this difference and ensure that all factors or costs in the side by side exhibit match the submitted rate manual.
- 2. The prior response states that medical offering loads are being removed. However, they are still present in the rate manual in Table 19. Please reconcile this difference and provide an updated rate manual or side-by-side exhibit as necessary.
- 3. The prior response states that capitation percentages are being removed. However, page 6 of the rate manual discusses using capitation percentages from Table 22. Please reconcile this difference and provide an updated rate manual as necessary. Further, please explain how the premium rate will account for capitation and include such determination in the rate manual.
- 4. Regarding the response to question #3 of the prior objection when comparing this table to the one filed in the prior filing, the Rx trend increases from 6.4% to 8.5%. Please provide support and justification for this increase in Rx trend.

We appreciate responses as expeditiously as possible to every objection in our letter, but no later than November 8, 2022.

Sincerely,

Allison Young, ASA, MAAA Consulting Actuary Lewis & Ellis, Inc. ayoung@lewisellis.com